

ID: 44

Exception: Migration of BA loops served by Integrated Subscriber Loop Carrier (SLC) systems to CLECs is not possible

Domain: POP

Owner: Steve Sesko

Date Uncovered: 3/15/99

Description: An exception has been identified as a result of the ongoing POP CLEC testing process. The following exception relates to the inability of Bell Atlantic (BA) to migrate subscriber loops that are currently served by Integrated Subscriber Loop Carrier systems (integrated SLCs) to CLEC-provided service.

CLECs have occasion to deal with BA customers who are willing to change their local service provider to a given CLEC as long as they can keep their existing telephone number and can have a seamless transition to their new carrier. The most common process that CLECs employ to "migrate" a customer to this type of arrangement is to place an order with BA to perform a UNE-loop with Local Number Portability (LNP) Hot Cut. Under this scenario, BA will port the subscriber's telephone number, and will work at the Main Distribution Frame (MDF) to disconnect the BA switch from the subscriber's loop and connect the CLEC switch to that same subscriber loop. These actions are designed to be performed in a coordinated manner with testing of the customer's service before and after the "LNP Hot Cut."

With regard to testing, BA claims to perform a Pre-Test of the customer's service. This test is designed to take place 48 hours prior to the scheduled LNP Hot Cut and uncover conditions potentially detrimental to the success of the LNP Hot Cut. Such detrimental conditions include, for example, the subscriber's service being provided over Integrated SLC. If this condition is uncovered 48 hours prior to the scheduled cut, it would allow BA and the CLEC sufficient time to react in a coordinated manner.¹

In current practice, Pre-Testing is generally not conducted and the attempt to perform an LNP Hot Cut on a BA customer being serviced over an Integrated SLC is generally never successfully completed. This usually causes the CLEC undue inconvenience and frequently leads to customer outages. These circumstances are all due to a lack of Pre-Testing on the part of BA. In many cases, the Integrated SLC is discovered at the time of the LNP Hot Cut at which point BA

¹ The Pre-Filing Statement of Bell Atlantic-New York (4/6/99, page 26) states that "If an existing Bell Atlantic-NY customer chooses to take service from a CLEC and the CLEC wants to use the existing Bell Atlantic-NY equipment and facilities as separate UNEs, Bell Atlantic-NY will make every effort to reuse elements of those existing facilities to the extent they meet CLEC order specifications. At this time, this is not possible when a CLEC orders a loop to serve a customer that Bell Atlantic-NY currently serves using Integrated Subscriber Loop Carrier. In such a case, Bell Atlantic-NY will assign other existing plant or provide new facilities (consistent with the terms in the CLEC's interconnection agreement) to provide UNE service. A change to other existing plant to provide this CLEC service will have no impact on the Public Service Commission-established interval."

advises CLEC it has no option other than to cancel the order and inform the customer that it must stay with BA. In some cases, BA may have processed their switch translations orders and ported the customer's telephone number(s) prior to the cancellation of the original order. This could potentially disconnect the customer's line from any type of telephone service.

Impact Assessment: CLECs have experienced delays of several days before the type of trouble described in this exception is cleared and the customer's service is restored with BA as the carrier. At this point the CLEC has lost its customer and its reputation as a capable CLEC is potentially damaged with the customer.

Status: Open

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